

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

BRAZOS ELECTRIC POWER  
COOPERATIVE, INC.,

Debtor.<sup>1</sup>

Chapter 11

Case No. 21-30725 (DRJ)

BRAZOS ELECTRIC POWER  
COOPERATIVE, INC. AND THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS,

Plaintiff / Intervenor-Plaintiff,

v.

ELECTRIC RELIABILITY COUNCIL OF  
TEXAS, INC.,

Defendant.

Adv. Proc. No. 21-03863 (DRJ)

**AMENDED WITNESS AND EXHIBIT LIST FOR  
NOVEMBER 15, 2021 HEARING**

**WITNESSES:**

- |   |                          |  |
|---|--------------------------|--|
| 1. All persons listed on the witness list of any party; and | <u>Judge:</u>            | Honorable David R. Jones<br>Courtroom 400  |
| 2. Any rebuttal and/or impeachment witness.                 | <u>Hearing Date:</u>     | November 15, 2021                          |
|   | <u>Hearing Time:</u>     | 2:00 p.m. (Central)                        |
|   | <u>Party's Name:</u>     | Brazos Electric Power<br>Cooperative, Inc. |
|   | <u>Attorneys' Names:</u> | Louis R. Strubeck Jr.<br>Jason L. Boland   |

<sup>1</sup> The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is: Brazos Electric Power Cooperative, Inc. (4729). Additional information regarding this case may be obtained on the website of the Debtor's claims and noticing agent at <http://cases.stretto.com/Brazos>. The Debtor's address is 7616 Bagby Avenue, Waco, TX 76712.

Paul Trahan  
Lino Mendiola  
Michael Boldt

Attorneys' Phone: (713) 651-5151

Nature of Proceeding: Hearing on *Electric Reliability Council of Texas, Inc.'s Emergency Motion to Dismiss* [Adv. Dkt. No. 191] and *Joinder of Calpine Corporation, Tenaska Power Services Co., NRG Energy, Inc., ENGIE Energy Marketing NA, Inc., Talen Energy Supply, LLC, South Texas Electric Cooperative, Inc., and NextEra Energy Marketing, LLC to the Electric Reliability Council of Texas, Inc.'s Motion to Dismiss and Answer to the Amended Complaint* [Adv. Dkt. No. 193]; and *Debtor's Emergency Motion for Entry of an Order Striking ERCOT's Amended Proof of Claim* [Adv. Dkt. No. 233].

### **EXHIBITS**

<b><u>Ex.</u></b>	<b><u>Description</u></b>	<b><u>Offered</u></b>	<b><u>Objection</u></b>	<b><u>Admitted / Not Admitted</u></b>	<b><u>Disposition</u></b>
1.	ERCOT's Proof of Claim				
2.	ERCOT Nodal Protocols regarding pricing [Adv. Dkt. No. 173-1]				
3.	ERCOT Nodal Protocols Section 21: Revision Request Process, January 1, 2021				
4.	Nodal Protocol Revision Request 626, as approved				
5.	Senate Bill 1580				
6.	ERCOT's Amended Proof of Claim				
7.	Redline of Addendum to ERCOT's Original and Amended Proofs of Claim				
8.	Any document or pleading filed in the above-captioned case, including any exhibits thereto				
9.	Any exhibit designated by any other party				

10.	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party				
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The Debtor reserves (i) the right to amend and/or supplement this Witness and Exhibit List at any time prior to the hearing; and (ii) the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing Witness and Exhibit List as appropriate. The Debtor also reserves the right to rely upon and use as evidence (i) exhibits included on the exhibit lists of any other parties in interest, and (ii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

*[Remainder of Page Intentionally Left Blank]*

Dated: November 13, 2021  
Houston, Texas

Respectfully submitted,

**EVERSHEDS SUTHERLAND (US) LLP**

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing document was served upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service on the 13th day of November, 2021.

/s/ Julie Harrison  
Julie Harrison